FOOD CONTACT

BYK Regulatory Information

BYK-UV 3511

Summary

BYK-UV 3511 is suitable for food contact applications under the following compositional provisions, provided that its use does not exceed the maximum concentration as indicated below:

Printing inks		
Europe	21st Amendment to Consumer Goods Ordinance (GIO)	Yes – max 1%
	Swiss Ordinance 817.023.21	
Industry	Nestlé Standard “Printing Inks for Food Packaging”	Yes
	EuPIA Charter	Yes

This summary reflects only the regulations assessed to date and does not preclude permitted uses in other regions or applications. Please refer to the explanation section below for detailed information on the regulations and assessment criteria considered.

Explanation

Printing Inks

EUROPE

21st Amendment to Consumer Goods Ordinance (GIO)

This product may be used in the manufacture of printing inks for packaging intended to come into direct contact with food in accordance with the requirements laid down in the German Consumer Goods Ordinance (Bedarfsgegenständeverordnung). Its components are either listed in Annex 14, Table 1 of the GIO, subject to derogation under §4, Abs. 5, Sentence 5 ("salt rule"), or are included in Regulation (EU) No 10/2011 without any restrictions indicated in columns 9 and/or 10.

The table below lists only substances that are used or known to be present and that are relevant for compliance with the specific migration limits (SML) and/or any restrictions set out in the German Ink Ordinance or Regulation (EU) No 10/2011:

FCM No.	CAS-No.	Name	SML / SML(T) [mg/kg]	Restrictions / Specifications
315	128-37-0	2,6-di-tert-butyl-p-cresol	3	/

In accordance with our role as manufacturer of substances, and based on information provided to us by raw material suppliers, non-intentionally added substances (NIAS) which have become known to us are assessed in accordance with internationally recognized scientific principles of risk assessment to ensure compliance with the requirements of Article 3(1)(a) of Regulation (EC) No 1935/2004.
The assessments are carried out under the assumption that this product is used in accordance with BYK's recommendations for food contact applications and/or under normal or foreseeable conditions of use, and considering the following parameters: 100% migration, 1 kg of food in contact with 6 dm² of packaging material, substrate weight of 15 g/m².

Swiss Ordinance 817.023.21

This product may be used in the manufacture of printing inks for packaging that are not intended to come into direct contact with food according to Swiss Ordinance 817.023.21 (as of 1 August 2026) since intentionally added substances in this product are either listed in Annex 2 and/or Annex 10 of this Ordinance, subject to Article 35(b), or are not classified as carcinogenic, mutagenic, or toxic to reproduction (CMR).

The table below lists only substances that are used or known to be present and that are relevant for compliance with the specific migration limits (SML) and/or any restrictions set out in Annex 2 or Annex 10 of this Ordinance.

FCM No.	CAS-No.	Name	SML / SML(T) [mg/kg]	Restrictions / Specifications
721	128-37-0	2,6-di-tert-butyl-p-cresol	3	/

Industry

Nestlé Standard "Printing Inks for Food Packaging" (02/04/2024)

Based on the current knowledge of the product composition and manufacturing process, this product does not intentionally contain any substances listed in Section 4 ("General Nestlé Exclusions and Minimisations") or Tables 5–8 of the Nestlé document Printing Inks for Food Packaging.

EuPIA Exclusion Charter (March 2026)

The product intentionally does not contain any of the substances listed in Annexes 1 and 2 of the 'EuPIA Charter on Raw Material Selection and Exclusion for Printing Inks and Related Products' (March 2026). The product itself as raw material is not classified and labeled with any of the Hazard Statements for Group I or Group II substances as defined in the section 'Selection Criteria & Procedures'.

General Remarks

Regulations apply within the context of respective regional framework regulations, e.g. Regulation (EU) No. 1935/2004 and FDA 21 CFR 174.5. Please note that it is the responsibility of both manufacturers of finished food contact articles and downstream business operators to ensure compliance with the applicable migration limits and restrictions of the finished materials or articles under specific real and/or foreseeable conditions of use.

Since traces of unknown processing aids cannot be fully excluded, compliance with general requirements is the responsibility of the end user.

BYK reserves the right to change or update the information without notice. At most, this letter is in effect for three years commencing the date of issue.

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This issue replaces all previous versions

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